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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DAVID B. CORNEAL and
SANDRA Y. CORNEAL,
Plaintiffs

v.

JACKSON TOWNSHIP,
Huntingdon County, Pennsylvania,
et al.,

Defendants

NO. 1:CV-00-1192

JURY TRIAL DEMANDED

RAMBO, J.

FILED
HARRISBURG, PA
JAN 08 2003
MARY E. D'ANDREA, CLERK
Per Deputy Clerk

MOTION FOR RECONSIDERATION

AND NOW, pursuant to Fed .R. Civ. P. 59(e) and Local Rule 7.10, Plaintiffs David B. Corneal and Sandra Y. Corneal submit this Motion for Reconsideration of the Court's Order dated December 23, 2002, and in support thereof, state:

1. On May 23, 2002, Defendants Jackson Township, W. Thomas Wilson, Michael Yoder, Ralph Wiler, Ann L. Wirth, David Van Dommelen and Barry Parks, submitted a motion for summary judgment in the above captioned matter, and filed a brief in support of their motion on or about June 6, 2002.

2. On or about June 24, 2002, the Corneals filed a cross-motion for summary judgment and combined papers in support of their motion and in opposition to the Defendants' motion for summary judgment.

3. On December 23, 2003, this Court entered its Order denying the Corneals' motion for summary judgment, and granting, in part, the Defendants' motion for summary judgment.

4. Specifically, the Court granted Defendants' motion for summary judgment as to all Defendants on Plaintiffs' procedural due process claims under both the U.S. and Pennsylvania Constitutions and Plaintiffs' claim for intentional interference with contractual relations. The Court also granted Defendants' motion for summary judgment on Count III, civil conspiracy, solely as to the Township.

5. Although the Clerk's Office entered the Court's Order and Opinion on December 23, 2002, copies of the Order and Opinion were not distributed to counsel for the Corneals by either facsimile or U.S. Mail until December 30, 2002.

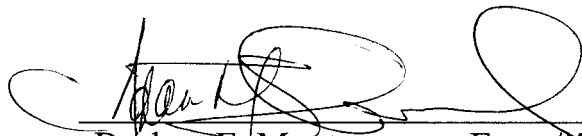
6. In light of the unusually short period of time available to Plaintiffs to consider the Court's Opinion and Order, Plaintiffs file this precautionary motion to preserve their right to seek reconsideration of the Court's Order granting defendant's motion for summary judgment on Plaintiffs' procedural due process claims under the U.S. and Pennsylvania Constitutions, on Plaintiffs' claim for intentional interference with contractual relations, and on Plaintiffs' claim against the Township for civil conspiracy.

7. Upon completing their analysis of the Court's Opinion, Plaintiffs will file a brief in support of their motion with ten days as provided by Middle District Local Rule 7.5 or, if appropriate, will withdraw any portions of the Motion that Plaintiffs may deem should be withdrawn.

WHEREFORE, Plaintiffs David B. Corneal and Sandra Y. Corneal respectfully request this Court to Reconsider its Order of December 23, 2002, granting, in part, Defendants' motion for summary judgment.

Respectfully submitted,

ECKERT SEAMANS CHERIN & MELLOTT, LLC

A handwritten signature in black ink, appearing to read "Bridget E. Montgomery", is written over a horizontal line.

Bridget E. Montgomery, Esq., #56105

Adam M. Shienvold, Esq., #81941

213 Market Street, 8th Floor

Harrisburg, PA 17101

717-237-6000

Date: 8 January 03

Attorneys for Plaintiffs,

David B. Corneal and Sandra Y. Corneal

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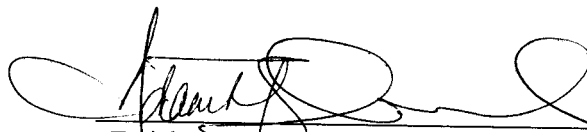
RAMBO, J.

CERTIFICATE OF CONCURRENCE/NON-CONCURRENCE

I hereby certify that I contacted Anthony R. Sherr, Esq., counsel for Defendants, with regard to this Motion and that Mr. Sherr indicated that he did not concur in the Motion for Reconsideration.

Respectfully submitted,

ECKERT SEAMANS CHERIN & MELLOTT, LLC



Bridget E. Montgomery, Esq., #56105
Adam M. Shienvold, Esq., #81941
213 Market Street, 8th Floor
Harrisburg, PA 17101
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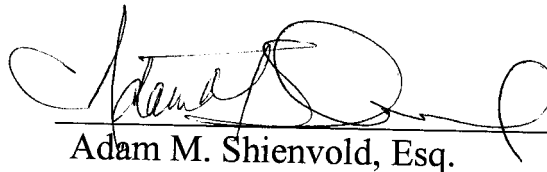
Date: 8 Jan 03

Attorneys for Plaintiffs,
David B. Corneal and Sandra Y. Corneal

CERTIFICATE OF SERVICE

I, Adam M. Shienvold, Esq., hereby certify that I am this day serving a copy of the foregoing document via first-class U. S. mail, which service satisfies the requirements of the Federal Rules of Civil Procedure and Middle District Local Rules of Court, addressed as follows:

Anthony R. Sherr, Esq.
Mayers, Mennies & Sherr, LLP
P. O. Box 1547
Blue Bell, PA 19422-0440


Adam M. Shienvold, Esq.

Date: 8 Jan 03

Attorney for Plaintiffs,
David B. Corneal and Sandra Y. Corneal